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Of Attorneys for Defendants

UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
EUGENE DIVISION

DENNIS RENO,

Case No. 10-536-HO

Plaintiff,

**DEFENDANTS' UNOPPOSED
MOTION TO EXTEND DISCOVERY
AND PRETRIAL DEADLINES**

vs.

CITY OF NEWPORT, an Oregon municipal
corporation, **WILLIAM D. BAIN**, an individual,
and **JIM VOETBERG**, an individual,

Pursuant to Fed. R. Civ. P. 6(b)

Defendants.

LR 7-1(a) CERTIFICATION

Counsel for defendants certifies that he has conferred with plaintiff's attorney, Kristine Lambert. Plaintiff joins in this motion.

MOTION

Defendants move for an extension of 120 days of the deadlines in the court's Order of March 4, 2011. This is the parties' second request for an extension of discovery and pretrial

deadlines. As required by Fed. R. Civ. P. 6(b)(1), there is good cause for the requested extensions of time.

The parties have made good progress on discovery, but need more time to finish document production, and to start and complete depositions. Plaintiff served separate requests for production of documents on each of the three defendants on October 1, 2010. The request served on defendant City of Newport (“Newport”) was extremely broad, covering 85 separate categories of documents. Defendants served their responses to the plaintiff’s document requests on November 3, 2010, and have been in the process of gathering, reviewing and producing documents since then. Defendants estimate that they have produced over 9,000 pages of documents so far.

The parties have been conferring on specific discovery requests in an effort to narrow their scope, and to reach a resolution without court intervention. Notwithstanding the foregoing efforts, the parties have still not finished document production, but hope to complete it in the next 30 days and be in a position to start depositions thereafter.

Defendants request that the current deadlines be extended by 120 days, as set forth below:

- Discovery to be completed: November 2, 2011;
- Dispositive motions due by: November 2, 2011;
- Joint Status Report due by: November 2, 2011; and
- Pretrial Order and Joint Alternate Dispute Resolution Report Deadline: November 30, 2011.

For the foregoing reasons, the court should grant this motion.

DATED this 16th day of June, 2011.

HARRANG LONG GARY RUDNICK P.C.

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CERTIFICATE OF SERVICE

I certify that on June 16, 2010, I served or caused to be served a true and complete copy of the foregoing **DEFENDANTS' UNOPPOSED MOTION TO EXTEND DISCOVERY AND PRETRIAL DEADLINES** on the party or parties listed below as follows:

 X Via CM / ECF Filing
_____ Via First Class Mail, Postage Prepaid
_____ Via Email
_____ Via Personal Delivery

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CERTIFICATE OF SERVICE